

EXHIBIT 54

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS) 03-MDL-1570 (GBD) (SN)
ON SEPTEMBER 11, 2001)
)

— — —
Friday, June 14, 2019

— — —
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Redacted
— — —

Videotaped Deposition of KHALIL
al-KHALIL, held at 801 S. Figueroa Street,
15th Floor, Los Angeles, California,
commencing at 9:09 a.m., on the above date,
before Debra A. Dibble, Certified Court
Reporter, Registered Diplomate Reporter,
Certified Realtime Captioner, Certified
Realtime Reporter and Notary Public.

— — —
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1 Q. (BY MR. POUNIAN) Immediately
2 after graduation from where?

3 A. From the College of Islamic Law
4 in Riyadh.

5 Q. And what was your first
6 government job at that time?

7 A. That was my first job.

8 Q. And what was the job, sir?

9 A. Was -- I was TA there. Was
10 really TA in the college. Teaching
11 assistant.

12 Q. And did you -- how long were
13 you there, sir, after that?

14 A. The hierarchy there is like
15 this. TA, then to be lecturer in the
16 university, when you get your master, then
17 when you get your Ph.D. to be assistant
18 professor. And exactly that, I really went
19 through all of this, three steps at the
20 university.

21 Q. Did there come a time, sir,
22 when you were employed by Saudi Arabia in
23 some other capacity?

24 A. Not at all.

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1 Q. I'm sorry?

2 A. Not at all. No.

3 Q. Did there come a time, sir,
4 when you were employed to work at the
5 Saudi Arabian embassy?

6 A. Embassy, I wasn't really
7 employed by them. I was with the university,
8 Imam Mohammad Ibn Saud University. The
9 ambassador asked the university for somebody
10 for advice, so there was an arrangement
11 between the university and the Saudi and the
12 ambassador in Washington. So I was allowed
13 or say dispatched to be -- for a while to be
14 at the embassy as an advisor.

15 Q. And your title there, you say,
16 was an advisor?

17 A. It's an advisor. They gave me
18 a title of vice chairman of Islamic
19 department.

20 Q. And what year did you start as
21 the vice chairman of the Islamic department?

22 A. I started 1997, 16th of June.

23 Q. Did you say, sir, 1997? Or

24 19 --

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1 A. Sorry, 1987.

2 Q. 1987.

3 A. '87. 16th of June.

4 Q. And you said you were
5 working -- you were actually employed by
6 the -- can we call it Imam U? Imam
7 University, is that --

8 A. Imam Mohammad Bin Saud
9 University.

10 Q. Is there a shorthand way of
11 saying that so I don't have to use all of
12 those words?

13 A. You shouldn't -- I don't know,
14 there is no abbreviation in our country.

15 Q. All right. Could we say
16 Imam University? Will you understand if I --

17 A. You say Imam Mohammad
18 University.

19 Q. Okay. The Imam Mohammad
20 University, who were you working for? You
21 said you were actually working for them while
22 you were in Washington DC?

23 A. Not working for them, working
24 with the ambassador, but still my employment

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1 was connected with the university. My salary
2 comes from the university, not from the
3 embassy.

4 Q. Okay. Who did you report to on
5 a day-to-day basis during your work at the
6 embassy in Washington DC?

7 A. To the -- to the chairman. His
8 Royal Highness Prince Mohammed bin Faisal,
9 who was the president of that -- of that
10 department.

11 Q. The president of the department
12 where?

13 A. At the embassy.

14 Q. And which department was that,
15 the Islamic Affairs?

16 A. The Department of Islamic
17 Affairs.

18 It was really newly established
19 when I went there.

20 MR. RAMIREZ: You've answered
21 the question.

22 Q. (BY MR. POUNIAN) And when was
23 it established? In 1987?

24 A. Exactly, yes.

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1 Q. And how many people staffed the
2 Islamic Affairs department when you first
3 went there?

4 A. Just the chairman and me at
5 that time.

6 Q. And who did the chairman report
7 to?

8 A. To the ambassador.

9 Q. And was the chairman also
10 someone that came from the Imam Mohammad
11 University at that time?

12 A. No.

13 Q. So he was working directly for
14 the ministry of foreign affairs?

15 A. Yes, sir.

16 Q. And you mentioned the
17 ambassador at that time was who?

18 A. His Royal Highness, Prince
19 Bandar bin Sultan bin Abdulaziz Al Saud.

20 Q. And we can refer to him as
21 Prince Bandar?

22 A. You can use any term you want.

23 Q. So am I correct that
24 Prince Bandar, you had a relationship with

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1 him before you went to join the embassy?

2 A. No.

3 MR. RAMIREZ: Objection to
4 form, but may answer if you
5 understand.

6 Q. (BY MR. POUNIAN) You had no
7 prior relationship with him?

8 A. I have no prior relation with
9 him.

10 Q. And he asked you to join the
11 embassy?

12 A. Yes.

13 MR. SHEN: Objection to form.

14 Q. (BY MR. POUNIAN) And can you
15 explain the circumstances of that?

16 A. Indeed he came to visit 1985,
17 students, as usual when he became ambassador.
18 I met with him at the reception, shaken his
19 hand. And there was the consulate here in
20 Los Angeles. One of them was a prince. So
21 he made some remarks, good remarks about me.
22 Then immediately his royal highness said I
23 would like to see you in Washington, is it
24 possible. I said yes. He said in a month,

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1 would like to meet with you. I met with him,
2 then he offered me the job.

3 Q. And did he explain to you what
4 the job would be?

5 A. Yes.

6 Q. And what did he say to you?

7 A. Just to be about -- because
8 indeed let me tell you this quickly. I
9 proposed to him some issues related to the
10 Saudi/America relation, that this relation
11 has to be really grounded and also to have
12 some other issues, not only the political
13 side, which means to have good relationship
14 with universities, good relation with some
15 entities around the United States of America,
16 so students and those American students could
17 go or some American young students could go
18 to study in the Saudi Arabia, could visit.

19 So it was like proposing to him
20 publicly, the public relation. And he
21 accepted it. And he said, Well, as long as
22 you are aware of these issues, I would ask
23 you to come and work with me. And this also,
24 I complain to him that some settlers were not

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1 really treated in the right way when they
2 come for medical treatment or come for some
3 issues. So he really liked that idea and
4 asked me to join with him to help in these
5 matters.

6 Q. And you were part of the
7 Islamic Affairs department? Is that correct?

8 A. I don't understand your
9 question. What's your question, please?

10 Q. Let me strike the question. As
11 part of your job at the Islamic Affairs
12 department, did you have any responsibilities
13 to oversee other Saudi government employees
14 inside the United States?

15 A. Employees, no. But to justice
16 was like a public relation, with mosques,
17 with Muslims who are around the --
18 particularly at that time, Iran was really a
19 big issue to Saudi Arabia, and they were
20 really preaching the Khomeinism. And Saudis
21 were so concerned that they may have an
22 influence on the Muslims of the
23 United States, whether Arabs or not Arabs.

24 Because of my background, that

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1 I graduated from Islamic college, because of
2 my good relation with students and other also
3 minorities, Muslim minorities like
4 African-American Muslims, the really main job
5 in that department is to create good relation
6 between the embassy and other Muslims around
7 groups, regardless of nationality or color,
8 but not the employee.

9 Q. (BY MR. POUNIAN) So you
10 interacted with mosques inside the United
11 States?

12 A. Yes.

13 Q. And all throughout the
14 United States; is that correct?

15 A. Yes, sir.

16 Q. And did you help them with
17 personnel in any way --

18 MR. RAMIREZ: Objection.

19 Q. (BY MR. POUNIAN) -- to staff
20 the mosques?

21 MR. RAMIREZ: Objection to
22 form, but you may answer.

23 THE WITNESS: Not -- no.

24 Q. (BY MR. POUNIAN) And in no way

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1 did you --

2 A. No.

3 Q. In no way were you involved
4 with the staffing of any mosques around the
5 United States; is that correct?

6 A. No, yes.

7 Q. Were you involved with the
8 funding of mosques anywhere around the
9 United States?

10 A. If there are request from,
11 there are -- yes, is the answer.

12 Q. And in what way were you
13 involved with funding of mosques around the
14 United States?

15 A. If there are some needs for
16 financial assistance or something to be fixed
17 in the mosque or someone who is imams or
18 needs some medical treatment or they were to
19 go to Saudi Arabia for performing hajj or
20 umrah -- I'm not sure if you are familiar
21 with these two terms -- go to Mecca, and
22 sometimes they send to be hosted in
23 Saudi Arabia; and Prince Bandar was busy. So
24 that department used to handle some of these

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1 issues. Which means assistance. Assisting
2 others.

3 Q. Now, when you were in this job
4 for Islamic Affairs department, were you a
5 diplomat for Saudi Arabia?

6 MR. SHEN: Objection to form.

7 MR. RAMIREZ: Join.

8 THE WITNESS: I became a
9 diplomat after two years.

10 Q. (BY MR. POUNIAN) And when did
11 you become a diplomat?

12 A. I think '89. Something like
13 that. I was given diplomat to get passports
14 and et cetera, et cetera, to facilitate my
15 traveling.

16 Q. When you first came to the
17 United States, what type of visa did you
18 have --

19 A. Student visa.

20 MR. RAMIREZ: Again, let him
21 ask the question completely. The
22 court reporter can only take one
23 person at a time.

24 Thank you.

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1 Q. (BY MR. POUNIAN) So you
2 arrived in the United States with a student
3 visa. And did you work for the Islamic
4 Affairs department at the embassy with a
5 student visa?

6 A. For a while, because there
7 were -- it's like assisting. It's like
8 volunteer work. It wasn't really -- it
9 wasn't really hiring or wasn't really with
10 formality. It was university, the one that
11 giving me or sending me the money, not the --
12 not the embassy.

13 And that was, by the way, a way
14 of Prince Bandar doing that, recruited some
15 students to him just to help him. One of
16 them was Adel Al-Jubier. One of them was
17 Rihab Massoud; who became ministers. Because
18 he was thinking that it's training for the
19 students also to be at the Saudi embassy for
20 a while.

21 Q. So you became a diplomat in --

22 A. About 1989.

23 Q. -- 1989?

24 A. Yeah.

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1 is that correct?

2 A. In the university or any person
3 in the government, every year they will be, I
4 think two percent or something for the
5 salary. Any person. Regardless of who you
6 are. So that's settled with the government.
7 So I got that one.

8 Q. You received no pay increases
9 because of your performance; is that correct?

10 MR. RAMIREZ: Objection,
11 misstates his testimony. But you may
12 respond if you understand.

13 THE WITNESS: I didn't really
14 understand that question, and it's not
15 relevant to me.

16 Q. (BY MR. POUNIAN) Well, my
17 question is, did you get any pay increase
18 because of the good work that you were doing?

19 A. No.

20 Q. And were you evaluated for your
21 work by anyone inside the government while
22 you were at the embassy?

23 A. No.

24 Q. You didn't get any job

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1 evaluations at all?

2 A. No. I am not supposed to be
3 evaluated. The university sending me. If
4 they are not happy, they can just send me --
5 get me back. That's it.

6 Q. And as part of your job at the
7 ministry -- excuse me. As -- strike the
8 question.

9 As part of your job with the
10 Islamic Affairs department, did you interact
11 with the Ministry of Islamic Affairs?

12 A. No.

13 Q. In 1993, was there a Ministry
14 of Islamic Affairs formed by Saudi Arabia?

15 MR. RAMIREZ: Objection as to
16 form.

17 THE WITNESS: Your question
18 again, please.

19 Q. (BY MR. POUNIAN) Do you recall
20 that in 1993 there was a Ministry of Islamic
21 Affairs formed by the government of
22 Saudi Arabia?

23 A. Yeah, I recall that.

24 Q. And do you recall at that time,

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1 after that time, while you were at the
2 embassy, working with any officials within
3 the Ministry of Islamic Affairs?

4 A. No.

5 Q. Were there representatives of
6 the Ministry of Islamic Affairs at the
7 embassy in Washington while you were in
8 Washington?

9 A. Yes.

10 Q. And who were the
11 representatives of the Ministry of Islamic
12 Affairs in Washington at that time?

13 A. During my time, the one who
14 really established the office, a gentleman, a
15 man, his name was Saleh.

16 Q. And did he have a staff?

17 A. I think yes.

18 Q. And who else can you recall was
19 working in that office headed by Mr. Saleh?

20 A. I forget all the names.

21 Q. And was Mr. Saleh eventually
22 replaced by anyone else that you can recall?

23 A. I left the embassy when he was
24 the chairman. I am not aware of the others.

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1 Q. So you have no recollection
2 yourself as you're sitting here today of any
3 person who worked for the Ministry of Islamic
4 Affairs at the embassy in Washington for --

5 A. Just --

6 Q. I'm just -- let me finish.

7 A. Go ahead.

8 Q. -- other than Mr. Saleh?

9 A. I could now imagine some faces,
10 but I can't recall the names, honestly.

11 Q. Did you know Khalid
12 al-Sowailem?

13 A. Yes.

14 Q. And who was Khalid al-Sowailem?

15 A. I heard he was the person who
16 came after Saleh, but I never interacted with
17 him.

18 Q. And he would have come in
19 around the -- you said around 1996; is that
20 correct? Mr. al-Sowailem?

21 MR. SHEN: Objection to form.

22 THE WITNESS: I don't know.

23 Q. (BY MR. POUNIAN) Well, you
24 said he came in around the time you left.

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1 Q. And you said you called the
2 deputy minister of Islamic Affairs
3 department.

4 A. Yes. To inform about it.

5 Q. And who was that person that
6 you spoke with?

7 A. His eminence Sheik Abdul Aziz
8 al-Ammar.

9 Q. And where is he located?

10 A. In Riyadh, Saudi Arabia.

11 Q. And why did you call him?

12 A. I was concerned about the
13 mosque.

14 Q. I understand that, but why did
15 you call him as opposed to someone else
16 within the government? What was -- what was
17 the reason you called him out of all the
18 people in the government?

19 A. First, because I know him. We
20 were colleague in the university. Graduated
21 the same day from the university and back
22 home in Kingdom of Saudi Arabia.

23 Second, he was the deputy
24 minister for Islamic affairs abroad.

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1 International issues.

2 Q. Did there come a time when you
3 expelled Thumairy from the mosque?

4 A. Fahad Thumairy wasn't expelled
5 from the mosque.

6 Q. Was he given any instructions
7 or any directions to limit certain
8 activities?

9 A. Yes.

10 Q. And what instructions was he
11 given?

12 A. Instruction was from me talking
13 to him that I wanted him to be -- not to host
14 Saudis, particularly when they come to the
15 mosque, without permission from me.

16 Those who comes for preaching,
17 particularly those who come for preaching,
18 say those who come who claim that they're
19 preaching, I don't want you to host them at
20 the mosque without permission.

21 Q. And when did you give that
22 instruction to Fahad al-Thumairy?

23 A. My recollection was in
24 August 19th -- 2001.

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1 Q. And before 9-11; is that
2 correct?

3 A. Before 9-11, yeah.

4 Q. And you were in Los Angeles at
5 the time?

6 A. I was in Los Angeles.

7 Q. And why did you give Fahad
8 al-Thumairy those instructions?

9 A. That's really interesting.
10 Because there were three guys came visiting.
11 I met with them at the mosque, by chance. I
12 asked them when did they arrive. They told
13 me three days ago. Then I really try to host
14 them for dinner. They said okay. We'll talk
15 with Fahad al-Thumairy. And I said, did you
16 meet with Fahad al-Thumairy? They said yes.

17 Anyway, just because of my
18 curiosity as a Saudi, and no one goes to
19 tuition at kingdom of Saudi Arabia that there
20 was really -- they were sigma of young and
21 sigma of preachers who were extremists.

22 I noticed that those guys were
23 not -- I mean, I was just surprised three who
24 are coming, if they were coming officially,

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1 Q. (BY MR. RAMIREZ) Join, but you
2 may answer if you understand.

3 A. Your question again?

4 Q. Did you have an understanding
5 that when he was giving prayers at the mosque
6 or working at the mosque, that he was being
7 paid by Saudi Arabia?

8 A. He was a student. That's my
9 understanding.

10 Q. So am I correct, sir, that what
11 you're saying is that his work at the mosque,
12 what he was doing at the mosque, had nothing
13 do with his employment by Saudi Arabia?

14 MR. SHEN: Objection to the
15 form.

16 THE WITNESS: That's my
17 understanding. He was a volunteer at
18 the masjid; at the mosque.

19 Q. (BY MR. POUNIAN) So he was not
20 working for Saudi Arabia when he was at the
21 mosque; is that right?

22 MR. SHEN: Objection --

23 THE WITNESS: That's my
24 understanding.

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1 MR. SHEN: -- to the form.

2 Q. (BY MR. POUNIAN) Now, you said
3 that before, that the main -- you called him,
4 Mr. Shuaib, the main Imam at the mosque?

5 A. Yes.

6 Q. Were there other imams at the
7 mosque?

8 MR. RAMIREZ: Objection as to
9 form, but you may answer if you
10 understand.

11 THE WITNESS: There are two or
12 three for -- you know, three imams who
13 were then imams, not there. One of
14 them would lead the prayer.

15 Q. (BY MR. POUNIAN) So who are
16 the other imams?

17 A. I can't recall the names. From
18 the community. And they are really
19 different, you know. Every time there is
20 different person living in the neighborhood
21 or even visiting. Then they will ask him to
22 lead the prayer.

23 Q. Was Fahad Thumairy ever the
24 imam of the King Fahad Mosque?

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1 A. He wasn't the imam, but he used
2 to lead the prayer sometimes.

3 Q. Was he ever considered an imam
4 at the mosque?

5 A. Others may consider him,
6 because when somebody like him with
7 qualification of Islamic studies, some people
8 immediately called him imam or something, but
9 particularly when he led some prayers. But
10 it's not to us that he is an imam or
11 something like that.

12 Q. So you did not consider him the
13 imam at the mosque --

14 A. Yes.

15 Q. -- is that correct?

16 A. That's correct.

17 Q. Do you recall having
18 discussions with anyone in the Saudi
19 government regarding having the Ministry of
20 Islamic Affairs send imams to work at the
21 mosque?

22 A. I can't recall any discussion.

23 Q. Okay. Do you think you would
24 have ever had such a discussion?

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1 A. I -- everything is possible. I
2 don't know.

3 Q. Was Fahad Thumairy paid by the
4 King Fahad Mosque?

5 A. No.

6 Q. Did he receive any money from
7 the King Fahad Mosque?

8 A. Yes.

9 Q. And what money did he receive?

10 A. As a volunteer person,
11 frequently he received some money as
12 compensation for some of his work. Some of
13 his -- what he did as a volunteer. Like
14 others. Volunteers, when they work for
15 something in the mosque, or particularly
16 Ramadan, the month of fasting, if there are
17 many works or something, then there would be
18 some payment for the volunteers.

19 MR. RAMIREZ: Would you like
20 him to move his mic?

21 Q. (BY MR. POUNIAN) Do you recall
22 telling the 9-11 commission that Fahad
23 Thumairy was part of the leadership of the
24 mosque?

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1 they wrote that he had this title. He
2 had that title. So I was surprised.

3 Q. (BY MR. POUNIAN) And why were
4 you surprised?

5 A. Because, to my best knowledge,
6 he was just a student.

7 Q. So you had no idea that he had
8 any employment relationship with Saudi
9 Arabia?

10 MR. SHEN: Objection to form.

11 THE WITNESS: He was an
12 employee in the Ministry of Islamic
13 Affairs -- with the Ministry of
14 Islamic Affairs back home, but not
15 other positions here in the
16 United States.

17 Q. (BY MR. POUNIAN) Did you
18 understand that he was working here in the
19 United States for the Ministry of Islamic
20 Affairs?

21 A. No, I didn't.

22 Q. I mean, could he have worked
23 for the Ministry of Islamic Affairs in the
24 United States --

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1 MR. RAMIREZ: Objection.

2 MR. SHEN: Objection as to

3 form.

4 THE WITNESS: I didn't know.

5 Q. (BY MR. POUNIAN) Well, I'm
6 saying legally, you -- did you understand
7 that it was not proper for a Saudi government
8 official to be working in the United States?

9 MR. RAMIREZ: Objection as to
10 form.

11 MR. SHEN: Objection to form.

12 Q. (BY MR. POUNIAN) Unless they
13 were a diplomat or unless they had some
14 authority from the U.S. government to do so?

15 MR. RAMIREZ: Objection to the
16 form.

17 MR. SHEN: Objection to the
18 form.

19 THE WITNESS: I didn't know
20 anything about that.

21 Q. (BY MR. POUNIAN) Do you recall
22 an occasion in which you met Osama bin Laden?

23 A. Yes.

24 Q. And how many times did you meet

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1 Osama bin Laden?

2 A. One time.

3 Q. And where was that?

4 A. In Jeddah.

5 Q. In Saudi Arabia?

6 A. In Saudi Arabia.

7 Q. And how did it -- how did it --
8 strike the question.

9 Can you tell us the
10 circumstances of that meeting?

11 A. My best recollection, I was
12 invited for lunch one day, not knowing who
13 would be there, by a friend, and met with
14 him. You know, he was there.

15 Q. Who invited you?

16 A. My boss. It was Mohammed
17 al-Faisal.

18 He was in Jeddah at that time.

19 Q. And your boss at Imam
20 University or your boss within the ministry
21 of foreign affairs?

22 A. He was my boss at the embassy.

23 Q. Okay. Your boss at the embassy
24 in Washington DC?

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1 A. Washington DC.

2 Q. And he was giving you --
3 inviting you to this meeting while -- were
4 you both in Jeddah at the time?

5 A. I was in Riyadh, he was in
6 Jeddah, so I received the call from him,
7 inviting me for a lunch.

8 Q. And why were you invited to
9 that particular lunch?

10 MR. RAMIREZ: Objection as to
11 form, but if you know.

12 Q. (BY MR. POUNIAN) Were you told
13 why you were invited to that lunch?

14 A. Yes. He told me.

15 Q. What did he tell you?

16 A. Before, when I arrived, he said
17 there is a -- he said there is a person who
18 was really, to him, is really something, you
19 know, that asked him to meet with him. The
20 guy asked to meet with this prince, through a
21 friend also that I didn't know.

22 Then he invited me to be with
23 him for assessments after the meeting.

24 Q. And can you tell us what

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1 happened at the meeting? Who was at the
2 meeting other than you and Mr. Bin Ladin?

3 A. There was a sheikh. One of the
4 scholars who was also invited without knowing
5 who was their guest.

6 Q. And when you say he was a
7 scholar, do you mean an Islamic scholar?

8 A. Yes.

9 Q. And was he from the -- from the
10 government?

11 A. No. He was working with Muslim
12 World League.

13 Q. And do you recall the name of
14 this Islamic scholar?

15 A. You want his name?

16 Q. Yes.

17 A. His name is Dr. Abdullah
18 Mussala. (Phonetic)

19 Q. And why was he invited to the
20 meeting? Do you know?

21 A. My interpretation because he
22 was a scholar, enlightened scholar, and
23 probably he -- I don't know, really, what it
24 was the cause, but my interpretation, because

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1 he was a scholar.

2 Q. Okay.

3 A. In Islamic issues.

4 Q. So can you tell us what was
5 said at the meeting to the best of your
6 recollection?

7 A. Yes. When Bin Laden came, he
8 immediately mentioned that he first of all
9 doesn't recognize Saudi Arabia, he doesn't
10 want to use -- he didn't want to -- he asked
11 the prince, in August, you are a prince, but
12 I'm not recognizing your family as royal
13 family. I'm not recognizing, he said, that
14 king as a king. I'm not recognizing the
15 crown prince as a crown prince. So I was
16 just name you. I will talk by names, Fahad,
17 Abdullah and you, the prince, Mohammed.

18 He said the prince why? He
19 said, because I don't recognize that, this
20 government instrument.

21 Then he started talking, he
22 said, my purpose of asking this meeting is to
23 facilitate to meet with one of your uncles,
24 King Fahad or Abdullah. That was his

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1 request.

2 Q. When was this meeting?

3 A. At the end of my recollection,
4 this recollection, it was at the end of
5 August 1990.

6 One month -- about one month
7 after the invasion of Saddam Hussein, the
8 president of Iraq, his invasion of Kuwait.
9 To Kuwait.

10 Q. And who is Prince Mohammad bin
11 Faisal?

12 A. As I mentioned to you, he was
13 the director of Islamic affairs department at
14 the embassy.

15 Q. And was he the son of King
16 Faisal?

17 A. No.

18 Q. Do you recall telling the 9-11
19 Commission that the mosque needed permission
20 from the consulate to perform a wedding?

21 MR. RAMIREZ: Object as to
22 form, but you may answer if you know.

23 THE WITNESS: Consul general
24 asked Sheikh Shuaib, based on what he

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1 told me, that kindly not to perform
2 marriages for Saudis without -- not
3 permission, but without the knowledge
4 and the acknowledgment of the
5 consulate. It was a request, kind
6 request.

7 MR. POUNIAN: I'd like to take
8 a break, but I want to ask a question
9 first that requires us to use an FBI
10 document. So why don't I do that now.
11 Why don't the people that don't have
12 the okay, leave the room.

13 People on the phone, anyone who
14 does not have the approval to see the
15 FBI documents.

16 MS. CAPONE: When should we
17 dial back in?

18 MR. POUNIAN: In about 15
19 minutes.

20 MS. CAPONE: Okay. 3:15. All
21 right. Well, you guys, 3:15. I'll
22 dial back in at that time. Thanks.

23 MR. COTTREAU: I'm just going
24 to note my absence for the record with

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1 Q. (BY MR. CARTER) Dr. Khalil, I
2 just have a few more questions.

3 You testified earlier that you
4 had been delegated for a number of years from
5 the Imam Mohammed Ibn Saud University to the
6 embassy in Washington; correct?

7 A. Yes, sir.

8 Q. And during that period, did you
9 encounter a man named Abdullah bin Laden at
10 all?

11 A. I can't recall.

12 Q. You don't know whether there
13 was a person named Abdullah bin Laden who,
14 like you, had been delegated from Imam
15 Mohammad Ibn Saud University to the embassy?

16 A. I don't know about him.

17 Q. You don't know who he is?

18 A. I don't know who he is.

19 MR. CARTER: That's all I have.

20 Thank you.

21 THE WITNESS: Anytime.

22 CROSS EXAMINATION

23 BY MR. SHEN:

24 Q. Good afternoon, Dr. Khalil.

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1 A. Good afternoon, Mr. Shen.

2 Q. My name is Andy Shen. I'm the
3 lawyer for the Kingdom of Saudi Arabia. I
4 have just a few questions for you and we'll
5 get you on your way this afternoon.

6 A. Thank you.

7 Q. The plaintiffs in this lawsuit
8 have made an allegation that senior Saudi
9 officials provided instructions to Fahad
10 al-Thumairy and Omar al-Bayoumi to assist the
11 two California hijackers, Nawaf al-Hazmi and
12 Khalid al-Mihdhar. Do you have any
13 information whatsoever that any senior Saudi
14 official provide any instruction to Thumairy
15 to assist the two California hijackers?

16 A. No.

17 Q. Do you have any information
18 whatsoever that Fahad al-Thumairy provided
19 instructions to anybody else to assist the
20 two California hijackers?

21 A. No, sir.

22 Q. Do you have any information
23 whatsoever that any senior Saudi official
24 instructed Omar al-Bayoumi to assist the

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1 California hijackers?

2 A. No, sir.

3 Q. Do you have any information
4 that Omar al-Bayoumi instructed anybody to
5 assist the California hijackers?

6 A. No.

7 Q. Are you aware of any Saudi
8 support whatsoever to the California
9 hijackers?

10 A. No.

11 Q. Are you aware of any support
12 that Muhanna -- strike that.

13 Are you aware of any
14 instruction from any senior Saudi official
15 that Mohammed al-Muhanna was to assist the
16 California hijackers?

17 A. Can you read again the
18 question? Because she was coughing. I
19 couldn't get it.

20 Q. Are you aware of any
21 instruction provided by a senior Saudi
22 official to Mohammed al-Muhanna to assist the
23 two California hijackers?

24 A. No, I didn't know anything

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1 about it.

2 Q. Are you aware of any
3 instructions that al-Muhanna provided to
4 anybody to assist the two California
5 hijackers?

6 A. I don't know.

7 Q. Are you aware of any assistance
8 that al-Muhanna provided to the two
9 California hijackers?

10 A. I'm not aware of that.

11 Q. You were asked certain
12 questions today about Ismail Mana. Do you
13 have any information about any instructions
14 that Mr. Mana was given by senior Saudi
15 officials to assist the two hijackers?

16 A. Not at all.

17 Q. Do you have any information
18 that Mr. Mana instructed anybody else to
19 assist the two hijackers?

20 A. No, I don't.

21 Q. Do you have any information
22 that Mr. Mana assisted the two hijackers in
23 any way, shape, or form?

24 A. No, I don't.

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1 Q. Now, plaintiffs have made the
2 allegation that the King Fahad Mosque was
3 somehow used as a conduit by the Kingdom of
4 Saudi Arabia to assist the two California
5 hijackers. Is there any truth to that
6 allegation?

7 MR. POUNIAN: Objection to the
8 question.

9 THE WITNESS: No truth.
10 Absolutely false.

11 Q. (BY MR. SHEN) I'm going to ask
12 you to take out some of the exhibits that we
13 looked at earlier today.

14 If you could, sir, take out
15 Exhibit 194.

16 Exhibit 194, Bates stamped KFM
17 420. This is a letter from yourself dated
18 July 12, 1995, to Prince Abdul Aziz. Do you
19 see that?

20 A. Yes. Just give me a second,
21 please.

22 [Document review.]

23 Q. (BY MR. SHEN) The second
24 paragraph of Exhibit 194, plaintiffs' counsel

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1 asked you to look at language that says: I
2 would like to inform you that this foundation
3 is the extension of the activities of the
4 kingdom and is a part of its organizations.

5 Do you see that language?

6 A. Yes.

7 Q. And you testified that this
8 foundation is the Ibn Taymiyyah Foundation;
9 correct?

10 A. Yes.

11 Q. Of which you're the chairman;
12 correct?

13 A. Yes.

14 Q. And the statement that the Ibn
15 Foundation is part of its organizations, was
16 the Ibn Taymiyyah Foundation part of the
17 Kingdom of Saudi Arabian government?

18 A. It is not part of Saudi Arabia
19 government.

20 Q. In fact, the Ibn Taymiyyah
21 Foundation is completely independent of the
22 Saudi Arabian government; correct?

23 A. That's correct.

24 Q. And that was true in 1995;

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1 Saudi Arabia?

2 A. That's what I believe -- was
3 told, but I have no idea, one of them that
4 was working. It just views, these are about
5 issues, political issues, and, you know, we
6 just, we tried in the mosque not to
7 accommodate those people if they have strong
8 views about -- against Saudi Arabia and
9 countries.

10 Q. Okay. And your understanding
11 was that those three individuals had strong
12 views against Saudi Arabia?

13 A. One of them. I'm not sure
14 about the others. But one of them said some
15 views in the discussion, and it's really to
16 us not toleratable.

17 MR. SHEN: I have no further
18 questions. Thank you very much.

19 THE WITNESS: Oh, I appreciate
20 it. Thank you very much.

21 (Khalil Deposition Exhibit 211,
22 Note, Subject: Fahd Al-Thuairy,
23 KSA0000006861, was marked for
24 identification.)

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1 [Document review.]

2 REDIRECT EXAMINATION

3 BY MR. POUNIAN:

4 Q. Have you seen this document
5 before, sir?

6 A. No.

7 Q. Have you seen the information
8 in this document before?

9 A. Not really. Not -- no.

10 Q. No?

11 A. Yes.

12 Q. This is a U.S. government
13 document that was prepared as part of the
14 9-11 investigation and produced to the
15 plaintiffs in this litigation.

16 A. Okay.

17 MR. SHEN: Objection to the
18 form, objection to the
19 characterization of the document.

20 Q. (BY MR. POUNIAN) Now, were you
21 aware, sir, that al-Thumairy and al-Muhanna
22 were believed to have been ordered expelled
23 from the mosque because they had extremist
24 views and cultivated extremist followers?

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1 MR. RAMIREZ: Objection to the
2 form.

3 MR. SHEN: This goes beyond the
4 scope of the cross.

5 THE WITNESS: Should I answer?

6 MR. RAMIREZ: Yes, you can
7 answer.

8 THE WITNESS: They were not
9 really expelled from the mosque. None
10 of them was expelled from the mosque.
11 They were -- Muhanna was asked not to
12 conduct meetings, activities, or
13 teaching or meeting people or asking
14 them or making the mosque like a point
15 for him to meet other people. That's
16 what happened.

17 Q. (BY MR. POUNIAN) Do you recall
18 that they were categorized as extremists
19 within the mosque?

20 MR. RAMIREZ: Objection as to
21 form. Assumes facts not in evidence,
22 but you can go ahead and answer if you
23 know.

24 MR. SHEN: Objection, beyond

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1 the scope.

2 THE WITNESS: Can you repeat
3 the question? I couldn't understand
4 it.

5 Q. (BY MR. POUNIAN) Do you recall
6 that there were followers of Thumairy and
7 Muhanna within the mosque, persons who
8 followed them as -- as Islamic believers,
9 they viewed them -- they were followers of
10 them within the mosque?

11 MR. RAMIREZ: Objection as to
12 form.

13 MR. SHEN: Objection to form.
14 Objection to the scope.

15 THE WITNESS: I can't answer
16 this question. I didn't know who is
17 following whom.

18 Q. (BY MR. POUNIAN) Okay. So are
19 you aware of any followers of al-Thumairy and
20 al-Muhanna within the mosque?

21 A. No, I didn't.

22 MR. SHEN: Objection to the
23 form, objection to scope.

24 THE WITNESS: No, I didn't

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1 know.

2 Q. (BY MR. POUNIAN) Did you
3 provide this information to the FBI?

4 MR. SHEN: Objection.

5 THE WITNESS: Did I --

6 MR. RAMIREZ: Hold on.

7 Objection as to form. Assumes facts
8 not in evidence, but provide an
9 answer.

10 MR. POUNIAN: Objection.

11 THE WITNESS: No answer.

12 MR. RAMIREZ: No, you can
13 answer if you know.

14 THE WITNESS: Question again?

15 Q. (BY MR. POUNIAN) Did you
16 provide any of the information that's in this
17 document to the Federal Bureau of
18 Investigation?

19 A. I can't recall.

20 Q. You can't recall?

21 A. Yeah.

22 Q. So it's possible that you did
23 provide some of this information to them?

24 MR. SHEN: Objection to form.

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Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS) 03-MDL-1570 (GBD) (SN)
ON SEPTEMBER 11, 2001)
)

— — —
Friday, June 14, 2019

— — —
THIS TRANSCRIPT CONTAINS
CONFIDENTIAL MATERIAL

Redacted

— — —
Videotaped Deposition of KHALIL al-
KHALIL, held at 801 S. Figueroa Street,
15th Floor, Los Angeles, California,
commencing at 9:09 a.m., on the above date,
before Debra A. Dibble, Certified Court
Reporter, Registered Diplomate Reporter,
Certified Realtime Captioner, Certified
Realtime Reporter and Notary Public.

— — —
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ERRATA			
	PAGE	LINE	CHANGE
1	<u>12</u>	<u>19</u>	<u>Because of parking violation</u>
2			REASON: <u>missing words</u>
3	<u>13</u>	<u>4</u>	<u>concept</u>
4			REASON: <u>missing word</u>
5	<u>14</u>	<u>6</u>	<u>Ph.D.</u>
6			REASON: <u>missing word</u>
7	<u>18</u>	<u>13</u>	<u>an advisor</u>
8			REASON: <u>missing word</u>
9	<u>37</u>	<u>17</u>	<u>bin Faisal</u>
10			REASON: <u>name correction</u>
11	<u>44</u>	<u>20</u>	<u>from 2005-2009</u>
12			REASON: <u>dates not written correctly</u>
13	<u>49</u>	<u>7</u>	<u>not obligated</u>
14			REASON: <u>"delegated" mistakenly written</u>
15	<u>58</u>	<u>1</u>	<u>no opportunity</u>
16			REASON: <u>the word "no" was left out</u>
17	<u>67</u>	<u>16</u>	<u>work in the country like others</u>
18			REASON: <u>missing word</u>
19	<u>107</u>	<u>12</u>	<u>but I mean he met with them</u>
20			REASON: <u>missing word</u>
21	<u>143</u>	<u>5</u>	<u>Muhammad ibn Abdul Wahhab</u>
22			REASON: <u>name correction</u>

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1 ERRATA			
2	PAGE	LINE	CHANGE
3	<u>146</u>	<u>23</u>	<u>picture on the wall</u>
4			REASON: <u>remove the word "but"</u>
5	<u>156</u>	<u>5</u>	<u>letter from the donor's office</u>
6			REASON: <u>missing word</u>
7	<u>23</u>	<u>24</u>	<u>visitors</u>
8			REASON: <u>visitors instead of settlers</u>
9	<u>164</u>	<u>14</u>	<u>discussions</u>
10			REASON: <u>missing word</u>
11	<u>174</u>	<u>18</u>	<u>Muhammad ibn Al-Saud</u>
12			REASON: <u>mistake in name</u>
13	<u>176</u>	<u>13</u>	<u>I didn't know if he was assigned</u>
14			REASON: <u>missing "if"</u>
15	<u>178</u>	<u>3</u>	<u>from princes</u>
16			REASON: <u>princes instead of "Brunei"</u>
17	<u>181</u>	<u>20</u>	<u>based on that decision</u>
18			REASON: <u>decision, not selection</u>
19	<u>187</u>	<u>14</u>	<u>all of the members</u>
20			REASON: <u>missing word</u>
21	<u>187</u>	<u>16</u>	<u>unanimous</u>
22			REASON: <u>missing word</u>
23	<u>189</u>	<u>11</u>	<u>be against</u>
24			REASON: <u>missing word</u>

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Page 418 (c)

ERRATA			
	PAGE	LINE	CHANGE
1			
2	209	21	one who started the discussion
3			REASON: missing word
4	224	21	Islamic Foundation
5			REASON: Islamic instead of Islam
6	225	17	to be on the board of trustees
7			REASON: missing words
8	226	6	can't remember the date
9			REASON: missing words
10	236	9	the board instructed management not to led him teach or lead prayers
11			REASON: clarity
12	237	12	we know his kids
13			REASON: missing word
14	238	6	we asked him
15			REASON: not we ask you
16	238	21	should not go to school
17			REASON: add "not"
18	246	20	institution
19			REASON: institution instead of instrument
20	266	24	uncles Fahad or Abdullah
21			REASON: without word "King"
22	281	14	smooth
23			REASON: smooth instead of sooth
24			

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Page 418 (d)

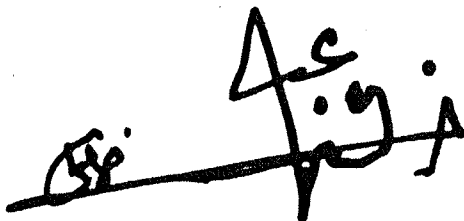
1	ERRATA		
2	PAGE	LINE	CHANGE
3	288_	19__	my colleagues_____
4			REASON: my colleagues instead of Islam college
5	289	9__	our foundation_____
6			REASON: _our instead of some_____
7	294	7__	endowment_____
8			REASON: endowment instead of government
9	294	6__	just nearby_____
10			REASON: remove "not"_____
11	294	13__	Yes_____
12			REASON: Yes instead of No_____
13	299_	11__	I just noticed_____
14			REASON: missing word_____
15	316_	22__	second time_____
16			REASON: time instead of point_____
17	336_	16_	to build for them_____
18			REASON: missing words_____
19	337	_9__	to oversee_____
20			REASON: oversee instead of see_____
21	346_	4_	run into_____
22			REASON: _run into instead of plan_____
23	347	1__	scholar_____
24			REASON: scholar instead of cattle

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ACKNOWLEDGMENT OF DEPONENT

I, KHALIL AL-KHALIL, do hereby
certify that I have read the foregoing pages
and that the same is a correct transcription
of the answers given by me to the questions
therein propounded, except for the
corrections or changes in form or substance,
if any, noted in the attached
Errata Sheet.



7/9/14

KHALIL AL-KHALIL

DATE

Subscribed and sworn to before me this
_____ day of _____, 20 ____.
My commission expires: _____

Notary Public